

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

ALEXANDRU BITTNER,
Defendant.

Case No. 4:19-cv-00415

ORDER GRANTING UNITED STATES MOTION IN *LIMINE*

Upon consideration of the United States' Motion in *Limine*, the Court finds that the United States' Motion in *Limine* is GRANTED.

IT IS ORDERED THAT any argument or evidence regarding the amount of the FBAR penalties assessed against Mr. Bittner; the IRS's actions and decisions during the FBAR examination, the income tax examination, and the Form 5471 examination; the Tax Court proceedings regarding the income tax examination; expert testimony, settlement discussions between the IRS and Bittner; and Bittner's Second through Seventh Defenses are to be excluded from the jury;

IT IS FURTHER ORDERED THAT any argument or evidence regarding the Internal Revenue Manual (IRM), IRS Interim guidance on FBARs, IRS Streamlined Compliance Programs, the 2014 IRS Streamlined Procedures, IRS News releases, and IRS FS-2011-13 is excluded.